UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

EASTERN DIVISION

Case No. 7:22-CV-178-FL

FILED

JAN 0 6 2023

PETERA: MOOFE JR. CLERK
BY

Beatrice Rivera Adams individually,	§ 8	BY BY
In pro persona	8	MOTION TO INTERVENE AS
Plaintiff,	8	PLAINTIFF-INTERVENOR
V.	§ 8	
UNITED STATES GOVERNMENT	§	
	8	

Defendants.

COMES NOW Beatrice Rivera Adams ("intervenor"), and moves this court to intervene in the above-captioned case as a party-plaintiff, pursuant to Rule 24 of the Federal Rules of Civil Procedure. In support of this motion, the intervenor submits:

- 1. The Plaintiffs' Complaint was filed on or about October 11, 2022, in the above-captioned case asserting claims under 42 U.S.C. § 1983; 42 U.S.C. § 1988; 42 U.S.C. § 1985; 42 U.S.C. § 1986; Monell-Related Claims; RICO conspiracy to commit fraud; legal malpractice; medical malpractice; breach of fiduciary duty; breach of implied and express warranties; unconscionable contracts; 28 U.S.C. § 1361; Bivens Claims; and declaratory and injunctive relief.
- 2. Rule 24(a) of the Federal Rules of Civil Procedure provides for intervention as of right when the applicant claims an interest in the subject matter of the action which Case 7:22-cv-00178-FL Document 275 Filed 01/06/23 Page 1 of 5

may be affected. Rule 24(b) provides for permissive intervention when an applicant's claim and the main action have common questions of law or fact.

- 3. The intervenor meets the requirements of Rule 24(a) of the Federal Rules of Civil Procedure in that she, just like the Plaintiffs in the action, seeks legal redress for the deprivation, under color of law, of the rights of families and children as secured by the United States Constitution, and other applicable law. Accordingly, disposing of the action without the intervenor may as a practical matter impair or impede intervenor's ability to protect its interest, unless the existing parties adequately represent that interest.
- 4. The intervenor also meets the requirements of Rule 24(b) of the Federal Rules of Civil Procedure in that both the Plaintiffs and the intervenor assert claims under 42 U.S.C. § 1983; 42 U.S.C. § 1988; 42 U.S.C.§ 1985; 42 U.S.C.§ 1986; Monell-Related Claims; RICO conspiracy to commit fraud; legal malpractice; medical malpractice; breach of fiduciary duty; breach of implied and express warranties; unconscionable contracts; 28 U.S.C. § 1361; Bivens Claims; and declaratory and injunctive relief; and these claims are based on substantially the same facts.
- 5. The intervenor's proposed intervention is timely. No dispositive motions have been filed with the Court, and discovery is not yet concluded.

WHEREFORE, the intervenor requests that this Court allow it to intervene and permit the intervenor to file a Complaint-in-Intervention. A proposed Order is attached hereto.

Dated: 12-21-2022

Respectfully submitted:

SIGNATURE Beatrice Runa Aday

Beatrice Rivera Adams

312-T Schillinger Rd. S. #155

Mobile, Alabama 36608

BringTateHome@gmail.com

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

EASTERN DIVISION

Case No. 7:22-CV-178-FL

Beatrice Rivera Adams individually,	§
In pro persona	§
	§ ORDER
Plaintiff,	8
v.	§ §
	§
UNITED STATES GOVERNMENT	§ § §
	§
	§
Defendants.	§
Upon good cause shown, the inte	ervenor's Motion to Intervene as Plaintiff-Intervenor
DATED:	

SIGNED:

CERTIFICATE OF SERVICE

I Beatrice Rivers Adams swear that on December 21, 2022 I have served

the persons and/or representative as addressed below, the following documents below:

CERTIFICATE OF INTERESTED PARTIES.

1. UNITED STATES GOVERNMENT U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530-0001

2. JOE BIDEN U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530-0001

3. KAMALA HARRIS U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530-0001

4. XAVIER BECERRA 200 Independence Avenue SW Washington, DC 20530-0001

5. MERRICK B. GARLAND U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530-0001

6. JERRY MILNER 187 Mullis Creek Pike Road, Alabama 36064

7. RACHEL LEVINE 330 C. St. SW Washington, DC 20001